Eric A. Schaffer (ES 6415) James C. Martin (*Pro hac vice*) REED SMITH LLP 435 Sixth Avenue Pittsburgh, Pennsylvania 15219 Telephone: (412) 288-3131

Andrew L. Morrison (AM 1071) REED SMITH LLP 599 Lexington Avenue New York, New York 10022 Telephone: (212) 521-5400

Attorneys for Wilmington Trust Company as Indenture Trustee

## 

PLEASE TAKE NOTICE that upon the annexed Affidavit of Eric A. Schaffer, sworn to on August 8, 2007, and the accompanying Memorandum of Law, Appellant Wilmington Trust Company, as Indenture Trustee, will move this Court at the United States District Courthouse, 500 Pearl Street, Courtroom 15D, New York, New York, at a time and date to be determined by

the Court, for an Order, pursuant to Fed. R. Bankr. P. 8011, modifying the current briefing schedule for these appeals and awarding such further relief as the Court deems proper.<sup>1</sup>

PLEASE TAKE FURTHER NOTICE that any opposition papers are due to be served on August 21, 2007, though this Court may act on this procedural motion in the absence of any such opposition papers. *See* Fed. R. Bankr. P. 8011(b).

Dated:

New York, New York August 8, 2007

## REED SMITH LLP

By: /s/ Andrew L. Morrison

Andrew L. Morrison (AM 1071) REED SMITH LLP 599 Lexington Avenue New York, New York 10022 (212) 521-5400

Eric A. Schaffer (ES 6415) James C. Martin (*Pro hac vice*) REED SMITH LLP 435 Sixth Avenue Pittsburgh, Pennsylvania 15219 (412) 288-3131

Attorneys for Appellant Wilmington Trust Company, as Indenture Trustee

The *Ad Hoc* Committee of Solutia Noteholders, appellant in Case No. 07 CV 5998, joins in this Motion.